



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 23, 2004

Mr. Russell Jim, Manager
Environmental Restoration and
Waste Management Program
Yakama Nation
P.O. Box 151
Toppenish, Washington 98948

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RECEIVED
AUG 26 2004
EDMC

Dear Mr. Jim:

Re: Remedial Alternatives for Gable Mountain Pond and 216-B-3 Main Pond

The United States Department of Energy (USDOE) is currently revising a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) feasibility study and proposed plan for the 200-CW-1 Cooling Water Group operable unit. The Gable Mountain Pond and the 216-B-3 Main Pond are included in that operable unit.

Ecology has the opportunity to identify to USDOE likely response scenarios and potentially applicable technologies to respond to environmental problems at the Gable Mountain Pond and the 216-B-3 Main Pond. Ecology is requesting the advice of the Yakama nation as follows.

The USDOE previously identified the likely response scenarios and potentially applicable technologies for these waste sites:

1. No action (a standard alternative used for comparison with other alternatives).
2. Maintaining existing soil cover and monitored natural attenuation, allowing 100 – 200 years of radioactive decay to bring radiation contamination down below human health-based standards for radiation exposure. This alternative could include application of herbicides to prevent intrusion by deep-rooted plants.
3. Excavation and removal of contaminated soil to the Environmental Restoration Disposal Facility, followed by revegetation of the excavated area.
4. Placement of clean backfill to augment the thickness of the existing clean soil cover, to create a 15-foot thick barrier to any plants or animals that could grow or dig into the contamination.

Ecology participated in an August 10 – 11, 2004, workshop on End States for the Hanford 200 Area. At that workshop, Ecology heard public comments favoring alternative #2 above.



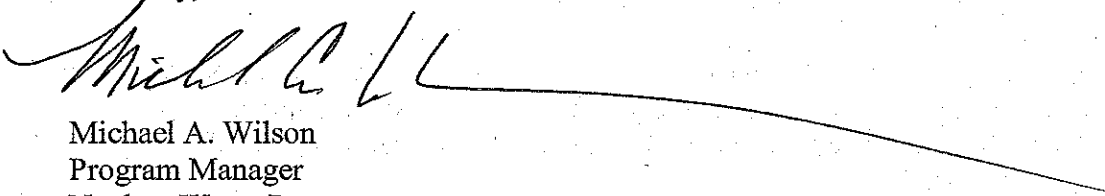
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A primary reason given for the support of that alternative was the recognition of the negative environmental impacts from alternatives #3 and #4. One negative impact would be the planned disturbance of habitat at another Hanford location (to obtain borrowed material to backfill or cap the Gable Mountain and B Ponds). Another negative impact would be the disturbance to the biological community at the ponds; those communities (including macro-biotic crusts) have been re-developing since the placement of the existing soil covers.

Ecology believes there may be an additional and probably preferable alternative. Ecology would like to develop a variation of alternative #2, involving 100 – 200 years of radioactive decay to bring radioactive contamination down below human health-based standards for radiation exposure (the remedial action objectives would also have to protect biota). Ecology wants to eliminate the need for periodic application of herbicides. Ecology is interested in advice from the Yakama Nation on re-establishing natural vegetation at the Gable Mountain Pond and B Pond. One goal for natural vegetation would be to establish plants with relatively shallow roots, which would not intrude into deeper contaminated zones. A related goal is to establish plants that would exclude deeper-rooting plants, by "out-competing" the latter plants.

I am requesting your support for staff-to-staff discussions between the Yakama Nation and Ecology. Ecology's point of contact is John Price. John can be contacted at (509) 372-7921.

Sincerely,



Michael A. Wilson
Program Manager
Nuclear Waste Program

JP:lkd

cc: Craig Cameron, EPA
Dennis Faulk, EPA
Kevin Clark, USDOE
Bryan Foley, USDOE
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John Price, Ecology
Administrative Record: 200-CW-1; 216-B-3 Pond